



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Bureau of Competition
Health Care Division

December 7, 2020

MEMO ENDORSED

The Honorable Denise Cote
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1910
New York, NY 10007

Re: *FTC, et al. v. Vyera Pharmaceuticals, LLC, et al.*, 1:20-cv-00706 (DLC)

Dear Judge Cote:

The Federal Trade Commission respectfully requests permission to file under seal Plaintiffs' opposition to Defendant Martin Shkreli's motion to stay all discovery.

The redacted portions of Plaintiffs' opposition brief contain information previously sealed by the Court in its February 19 order to seal portions of the complaint (ECF 41), its September 10 order to seal Mr. Shkreli's list of attorneys and matters (ECF 261 at 3-4), and its November 30 order to seal certain information included in Mr. Shkreli's motion to stay (ECF 322). The FTC does not seek to seal any exhibits.

In accordance with Rule 7.B of Your Honor's Individual Practices in Civil Cases and with the requirements for electronically filing under seal, the FTC will publicly file a redacted version of Plaintiffs' opposition memorandum of law. On a separate docket entry, the FTC will file under seal the opposition brief with the proposed redactions highlighted.

Sincerely,

/s/ Markus H. Meier
Markus H. Meier
Assistant Director

Granted.

12.8.2020.

A handwritten signature in black ink, appearing to read "Denise Cote", is written over a horizontal line.

DENISE COTE

United States District Judge